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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:

MARIE L. CHAVANNES

Debtor

Case No.: 13-18075-REF

Judge: Richard E. Fehling

Chapter 13

**OBJECTION OF THE DEBTOR TO PROOF OF CLAIM NO. 8-1
FILED BY FIRST AMERICAN TITLE INSURANCE COMPANY**

Pursuant to Rule 3007 of the Federal Rules of Bankruptcy Procedure, MARIE L. CHAVANNES (the "Debtor"), by and through her counsel, Tudor Neagu, Esq., hereby objects to Proof of Claim No. 8-1 filed by FIRST AMERICAN TITLE INSURANCE COMPANY. ("First American"), docketed as Claim No. 8-1 in the amount of \$and, in support thereof, respectfully represents as follows:

1. On September 16, 2013 (the "Petition Date"), the Debtor filed a voluntary Petition for relief under Chapter 13 of the Bankruptcy Code.
2. On or about December 10, 2013, First American filed its Proof of Claim No. 8-1 on the claims register (the "POC") against the Debtor in the amount of \$247,783.16.
3. The Debtor objects to the POC because it is based on a state claim that was void ab initio, as it was entered in violation of an automatic bankruptcy stay, as per Debtor's Amended Motion to Compel (Document no. 75).
4. Debtor requests that the POC filed by First American be expunged in its entirety.

RESERVATION OF RIGHTS

5. The Debtor expressly reserves the right to amend, modify or supplement this Objection. Additionally, the Debtor expressly reserves the right to (i) respond to any allegation or defense that may be raised in a response filed by or on behalf of Toyota and (ii) further object to any claim for which Toyota provides (or attempts to provide) additional documentation or substitution. Should one or more of the grounds of objection stated in this Objection be overruled, the Debtor reserves the right to object to POC on any other grounds that bankruptcy or non-bankruptcy law permits.

NOTICE

6. Notice of this Objection shall be given to (i) the Office of the United States Trustee, (ii) First American, (iii) Counsel for First American and (iv) all parties who have requested notice pursuant to Federal Rule of Bankruptcy Procedure 2002. The Debtor submits that no further or other notice need be provided.

WHEREFORE, International Tower Supply, LLC, the Debtor herein, respectfully requests that the claim of First American, docketed as Proof of Claim No. 8-1, in the amount of \$247,783.16 be expunged and disallowed in its entirety, and for such other and further relief as this Court deems just and proper.

Respectfully submitted,

Dated: April 9, 2014

By: /s/ Tudor Neagu
Tudor Neagu, Esquire LD.: 03124-2010